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March 4, 2005

The Honorable James K. Bredar,  
U.S. Magistrate Judge  
United States District Court  
for the District Of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201

**RE: In the Matter of the Complaint of Eternity Shipping,  
Ltd and Eurocarriers, S.A. for Exoneration from or  
Limitation of Liability  
Civil Action No.: BEL-01-0250**

Dear Judge Bredar:

In reference to Judge Bredar's Memorandum and Order denying claimant Tate & Lyle's Motion for Sanctions (Document no. 122), in particular the direction to counsel to immediately confer and submit a joint motion for modification to Chief Judge Legg by March 10, 2005, Tate & Lyle would respectfully request a short two week extension of time to submit the joint motion to March 24, 2005.

Jeffrey Asperger is currently representing the plaintiff in a trial taking place in Phoenix, Arizona, which is expected to last until March 15, 2005, and therefore is unable to confer with counsel until after that date. Mr. Asperger is lead counsel for Tate & Lyle and was exclusively involved in the taking of the depositions and other discovery proceedings in this case. He is therefore essential to any conference between counsel concerning modification of discovery and preparation of a joint motion to Chief Judge Legg.

This extension should not effect the schedule in this case as no further proceedings will be scheduled until the court rules on the Motion for Summary Judgment file by third party Defendant ABS.

There are no objections to this request from the other parties in this case. We would respectfully request your approval of this revision to your Order.

Very truly yours,

James D. Skeen

cc: Chief Judge Benson E. Legg  
All Counsel  
JDS/mlh